

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	No. 2:20-cr-00135-DWA-1
)	
vs.)	Filed Electronically
)	
MATTHEW MICHANOWICZ,)	
)	The Honorable Donetta J. Ambrose,
Defendant)	U.S. District Court Judge

MOTION TO FILE DOCUMENTS UNDER SEAL

Defendant Matthew Michanowicz, through counsel, files this Motion requesting permission to file documents under seal. In support, Defendant submits the following:

1. Confidential and extremely sensitive information about the Defendant's personal history and characteristics will be addressed in Defendant's forthcoming sentencing memorandum.
2. To avoid the disclosure of confidential and sensitive information, Defendant requests entry of an Order permitting the filing of the memorandum and supporting exhibits under seal.
3. Rule 49.1(d) of the Federal Rules of Criminal Procedure permits a court to order that a filing be made under seal.
4. Defendant respectfully contends that the extremely sensitive information described in his sentencing memorandum is necessary for this Court to consider in imposing a fair and just sentence. However, Defendant's privacy interests weigh heavily in favor of non-disclosure to the general public.
5. Defendant requests that the sentencing memorandum and supporting exhibits remain under seal permanently.

WHEREFORE, Defendant respectfully requests that the Court enter an Order permitting the filing of the sentencing memorandum and supporting exhibits under seal permanently.

Respectfully submitted,

s/ Kenneth J. Haber

Kenneth J. Haber, Esquire
PA I.D. No. 65968

DIFENDERFER, ROTHMAN & HABER
304 Ross Street, Suite 400
Pittsburgh, PA 15219

(412) 338-9990
(412) 338-9993 Fax
khaber@drhlawyers.com

Date: December 2, 2021

Counsel for Defendant, Matthew Michanowicz